

CHRISTOPHER CHIOU  
Acting United States Attorney  
Nevada Bar Number 14853  
JARED L. GRIMMER  
Assistant United States Attorney  
501 Las Vegas Boulevard South, Suite 1100  
Las Vegas, Nevada 89101  
Tel: (702) 388-6336/Fax: (702) 388-6418  
[jared.l.grimmer@usdoj.gov](mailto:jared.l.grimmer@usdoj.gov)  
*Attorneys for the United States*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No. 2:22-mj-00275-EJY

**Plaintiff,**

V.

## **Stipulation for an Order Directing Probation to Prepare a Criminal History Report**

ALBERTO JIMENEZ-GOMEZ,  
aka "Alberto Gomez Jimenez,"  
aka "Alberto Jimenez,"  
aka "Feliciano Jimenez,"

**Defendant.**

IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou, Acting United States Attorney, and Jared L. Grimmer, Assistant United States Attorney, counsel for the United States of America, Rene L. Valladares, Federal Public Defender, and Aden Kebede, Assistant Federal Public Defender, counsel for Defendant ALBERTO JIMENEZ-GOMEZ, that the Court direct the U.S. Probation Office to prepare a report detailing the defendant's criminal history.

This stipulation is entered into for the following reasons:

1. The United States Attorney's Office has developed an early disposition program for immigration cases, authorized by the Attorney General pursuant to the

1 PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has  
2 extended to the defendant a plea offer in which the parties would agree to jointly request an  
3 expedited sentencing immediately after the defendant enters a guilty plea.

4           2. The U.S. Probation Office cannot begin obtaining the defendant's criminal  
5 history until after the defendant enters his guilty plea unless the Court enters an order  
6 directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of  
7 a defendant's initial appearance when charged by indictment.

8       3. The U.S. Probation Office informs the government that it would like to begin  
9 obtaining the criminal history of defendants eligible for the early disposition program as  
10 soon as possible after their initial appearance so that the Probation Office can complete the  
11 Presentence Investigation Report by the time of the expected expedited sentencing.

12       4. Accordingly, the parties request that the Court enter an order directing the  
13 U.S. Probation Office to prepare a report detailing the defendant's criminal history.

14 DATED this 20th day of April, 2022.

Respectfully Submitted,

RENE L. VALLADARES  
Federal Public Defender

CHRISTOPHER CHIOU  
Acting United States Attorney

/s/ Aden Kebede  
ADEN KEBEDE  
Assistant Federal Public Defender  
Counsel for Defendant ALBERTO  
JIMENEZ-GOMEZ

/s/ Jared L. Grimmer  
JARED L. GRIMMER  
Assistant United States Attorney

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No. 2:22-mj-00275-EJY

Plaintiff,

## **Order Directing Probation to Prepare a Criminal History Report [Proposed]**

ALBERTO JIMENEZ-GOMEZ,  
aka "Alberto Gomez Jimenez,"  
aka "Alberto Jimenez,"  
aka "Feliciano Jimenez,"

Defendant.

Based on the stipulation of counsel, good cause appearing, and the best interest of justice being served:

IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a report detailing the defendant's criminal history.

DATED this 22nd day of April, 2022.

Elayna J. Youchah  
HONORABLE ELAYNA J. YOUCRAH  
UNITED STATES MAGISTRATE JUDGE